

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
TO USPS WITNESS REBECCA ELMORE-YALCH
(APWU/USPS-T11-17-19)
(February 23, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness Rebecca Elmore-Yalch (USPS-T-11). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson
Jennifer L. Wood
Counsel for American Postal Workers Union, AFL-CIO

APWU/USPS-T11-17 Pages 50-52 of your testimony presents quantitative projections of volume change behavior of customers due to service standard changes by major class. What are the projections for each major sub-category of mail and parcels within the classes, and specifically the parcel sub-categories?

- a) For FCM and Standard Mail is there a projection for the parcel sub-category within each main class of mail? If so, please provide these forecasts
- b) Is there a forecast for Package Mail class of market dominant products? If so, please provide this forecast.
- c) Is there a forecast for the parcel component of Priority and Express mail? If so, please provide these forecasts.

APWU/USPS-T11-18 Please refer to pages 50-52 of your testimony. Customer derived forecasts for First Class Mail show declines for each customer category. However, the forecast declines are negligible for National, Premier and Small Business accounts, while the declines forecasted for Preferred accounts and Consumers are quite large (with Home businesses actually forecasting an increase in volume). How are these very different forecasts explained?

- a) For Priority Mail, two classes (National and Premier) of customers forecast significant increases in volume while the other four forecast very significant declines in use. How are these forecasts, which run counter to each other, explained?
- b) For Express Mail, only Premier accounts forecast an increase in use and it is a very large 10.23% increase. All other classes project small to very large declines in usage. How are these differences in forecasts explained?
- c) Within the National account category, only Priority Mail is expected to increase while all other categories of Mail decline. Why?

APWU/USPS-T11-19 One could argue that many of the quantitative results are counter-intuitive, for example, volume is forecasted to increase in only three "cells" of the forecast matrix (National accounts use of Priority Mail and Premier Accounts use of Priority and Express Mail) specifically when the reduction in service standards is the only factor considered. How is this explained and to what extent do these apparent anomalies cast doubt on the quality of the forecast results?